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Counsel for Sprouts Farmers Market, Inc. and SFM, LLC d/b/a Sprouts Farmers Market

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

HARVEST SHERWOOD FOOD
DISTRIBUTORS, INC., *et al.*,¹

Debtors.

} Chapter 11
} Case No. 25-80109 (SGJ)
} (Jointly Administered)

**SPROUTS FARMERS MARKET'S MOTION PURSUANT
TO 28 U.S.C. §§ 1408 & 1412 AND RULE 1014 OF THE FEDERAL
RULES OF BANKRUPTCY PROCEDURE TO TRANSFER VENUE**

¹ The debtors in these chapter 11 cases, together with the last four digits of each Debtor's federal tax identification number, are Del Mar Holding LLC (9207), Del Mar Acquisition Inc. (8866), Surfliner Holdings, Inc. (9456), Harvest Sherwood Food Distributors, Inc. (8995), Harvest Meat Company, Inc. (9136), LAMCP Capital, LLC (N/A), Western Boxed Meats Distributors, Inc. (8735), Cascade Food Brokers, Inc. (1389), Hamilton Meat, LLC (6917), SFD Acquisition LLC (8995), SFD Transportation Corp. (1551), Sherwood Food Distributors, L.L.C. (4375), and SFD Company LLC (1175) (collectively, the "Debtors" or "Harvest"). The Debtors' service address is c/o Epiq Corporate Restructuring, LLC 10300 SW Allen Blvd., Beaverton, OR 97005.

If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at <https://ecf.txnb.uscourts.gov/> no more than twenty-four (24) days after the date this motion was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk and filed on the docket no more than twenty-four (24) days after the date this motion was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

A hearing will be conducted on this matter on June 26, 2025 at 2:30 p.m. (prevailing Central Time) at 1100 Commerce Street, Room 1421, Dallas, TX 75242-1496 in Room 1428 (Courtroom #1) on the 14th floor. Audio communication will be by use of the Court's dial-in facility. You may access the facility at 1.650.479.3207. The meeting code is 2304 154 2638. Video communication will be by the use of the Cisco WebEx platform. Connect via the Cisco WebEx application or click the link on Chief Judge Stacey G. C. Jernigan's home page. Click the settings icon in the upper right corner and enter your name under the personal information setting. WebEx hearing instructions may be obtained from Judge Jernigan's hearing/calendar site: <https://www.txnb.uscourts.gov/judges-info/hearing-dates/chief-judge-jernigans-hearing-dates>.

Hearing appearances must be made electronically in advance of electronic hearings. To make your appearance, click the "Electronic Appearance" link on Judge Jernigan's home page. Select the case name, complete the required fields and click "Submit" to complete your appearance.

Sprouts Farmers Market, Inc. and SFM, LLC d/b/a Sprouts Farmers Market (together, "Sprouts"), by and through their undersigned counsel, respectfully move to transfer the above-captioned cases under 28 U.S.C. § 1408 and Fed. R. Bankr. P. 1014(a)(2) because venue is not proper in this district. In the alternative, if the Court determines venue is technically proper, Sprouts moves to transfer venue of these cases in the interest of justice under 28 U.S.C. § 1412. As set forth in the accompanying *Brief in Support of Sprouts Farmers Market's Motion Pursuant to 28 U.S.C. §§ 1408 & 1412 and Rule 1014 of the Federal Rules of Bankruptcy Procedure to Transfer Venue* ("Brief") filed herewith in support of this motion, Sprouts is likely to prevail on the merits.

Considering all relevant factors outlined in the Brief, the Northern District of Texas is not the appropriate venue for these Chapter 11 Cases. Debtors maintain no meaningful operations or assets here, and most creditors, key witnesses, and principal litigation assets are located in either the Southern District of California or the District of Delaware. Transferring venue to one of these districts will promote judicial efficiency, reduce administrative burdens, and better serve the interests of justice and convenience for all parties involved. Accordingly, transfer of these Bankruptcy Cases is warranted under 28 U.S.C. § 1408 and/or §1412.

WHEREFORE, Sprouts respectfully requests this Court's entry of an Order immediately transferring these Bankruptcy Cases to the Southern District of California or the District of Delaware and granting such other and further relief.

Dated: May 27, 2025

Respectfully submitted,

DORSEY & WHITNEY LLP

/s/ Gregory W. Werkheiser

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*Counsel for Sprouts Farmers Market, Inc. and
SFM, LLC d/b/a Sprouts Farmers Market*

CERTIFICATE OF CONFERENCE

I certify that on May 27, 2025, I spoke with Jon Muenz and Ryan Fink from Sidley Austin LLP, counsel for Debtors. Counsel represented to me that Debtors oppose the Motion. An agreement could not be reached regarding the venue of these bankruptcy cases.

/s/ Gregory W. Werkheiser

Gregory W. Werkheiser

CERTIFICATE OF SERVICE

I certify that on May 27, 2025, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas on those parties registered to receive electronic notices.

/s/ Gregory W. Werkheiser

Gregory W. Werkheiser